Helicopter Association International

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Dedicated to the Advancement of the International Helicopter Community

May 31, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 18-122; Report on the Feasibility of Allowing Commercial Wireless Services, Licensed Or Unlicensed, to Use or Share Use of the Frequencies Between 3.7-4.2 GHz.

Dear Ms. Dortch:

On behalf of Helicopter Association International (HAI), which represents over 4000 members operating rotorcraft in the United States and abroad, I thank you for the opportunity to submit comments related to the potential for more intensive utilization of the 3.7-4.2 GHz band and possible repurposing of the spectrum, to include wireless operations. Every day in the United States, helicopter operators provide a valuable service to our nation though a wide array of missions including security, air medical, law enforcement, utilities, construction, and airborne rescue services. Accurate and reliable data from onboard systems is essential to the safety of these operations.

HAI strongly believes that any decision to repurpose the 3.7-4.2 GHz band must be fully supported by appropriate analyses and testing to ensure a complete understanding of any interference or adverse impacts to aviation critical systems. This is of particular importance when considering the unique aspects of low altitude aircraft operations, including helicopters, and the protections these systems provide.

As part of an integrated flight cockpit, the radio altimeter is one of these critical pieces of equipment. It operates within the adjacent Aeronautical Radio Navigation Service allocation of 4.2-4.4 GHz and provides invaluable safety-of-flight information to crews. The radio altimeter has been cited as a key contributing factor to the prevention of numerous aviation accidents. In many cockpits, the radio altimeter is integrated into other avionics systems - including Ground Proximity Warning Systems that are installed on most commercial helicopters and thousands of fixed wing aircraft. The National Transportation Safety Board (NTSB) and the Federal Aviation Administration (FAA) have validated the critical importance of the radio altimeter to the extent that, as of April 24, 2017, a radio altimeter is required in every helicopter weighing over 2,950 pounds and operated on a CFR 14 Part 135 Certificate. Thousands of helicopters, including those in our military, are outfitted with radio altimeters, and their crews rely on them every day. Plainly stated, radio altimeters save lives.

HAI recognizes the benefits that come with an effective utilization of the radio spectrum. However, in consideration of the potential adverse impacts to safety-of-flight systems, HAI strongly recommends that the Commission partner closely with the FAA, NTSB and industry to gain a complete understanding of the potential impacts to radio altimeter operations that could result from commercial wireless operations in the 3.7-4.2 GHz band.

Thank you for reviewing our comments for this very important safety-of-flight concern. I may be reached at 703-683-1606 or at chris.martino@rotor.org.

Sincerely,

Christopher A. Martino
Vice President of Operations
Helicopter Association International